

Exhibit A

LUTZ, SHAFRANSKI, GORMAN and MAHONEY, P.A.

77 Livingston Avenue
P.O. Box 596
New Brunswick, New Jersey 08903
(732) 249-0444
Attorneys for Plaintiff(s)
Attorney Bar#: 024551983

Plaintiff(s)

AHMED E. ELANSARY and THANAA
F. ELSHATER,

vs.

Defendant(s)

UNITED STATES POSTAL SERVICE
and MOHAMED BANINE.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
DOCKET NO.

CIVIL ACTION

**COMPLAINT AND DEMAND
FOR TRIAL BY JURY**

Plaintiffs, residing at 1227 Brookside Road, Piscataway, New Jersey, complaining of the defendants, hereby allege and say:

FIRST COUNT

1. On or around June 21, 2021, the plaintiffs were occupants of a motor vehicle traveling generally westbound on Centennial Avenue near its intersection with Hoes Lane in Piscataway, New Jersey.

2. At the aforesaid time and place, the defendant, United States Postal Service, was the owner of a motor vehicle which was carelessly and negligently operated by its agent, servant, employee, and/or with its permission, by the defendant, Mohamed Banine, such that it struck and collided with vehicle occupied by the plaintiffs.

3. As a direct and proximate result of the carelessness and negligence of the respective defendants as aforesaid, the

respective plaintiffs sustained severe personal injuries, has and will suffer pain, has and will incur medical expenses, and has and will be unable to engage in their usual activities, all to their damage.

WHEREFORE, plaintiffs demand judgment against the defendants for damages, interest, and costs of suit on this count.

SECOND COUNT

1. Plaintiff repeats each and every allegation in the First Count as if fully set forth herein.

2. As a direct and proximate result of the negligence of defendants as aforesaid, the motor vehicle of plaintiff, Ahmed E. Elsansary, was damaged, it depreciated in value and he lost the use thereof, all to his damage.

WHEREFORE, plaintiff Ahmed E. Elsansary demands judgment against the defendants for damages, interest, and costs of suit on this count.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury as to all issues in the within Complaint.

CERTIFICATION PURSUANT TO R. 4:5-1

The matter in controversy in this case is not, to the best of my knowledge, the subject of any other action pending in any Court or pending Arbitration proceeding, nor is any action or Arbitration contemplated at this time. I am not aware of any other parties who should be joined in this action at the present time.

DESIGNATION OF TRIAL COUNSEL

In accordance with R. 4:25-4, John R. Gorman, Esq. is hereby designated as trial counsel in the within matter.

LUTZ, SHAFRANSKI, GORMAN
and MAHONEY, P.A.
Attorneys for Plaintiff(s)

BY:

John R. Gorman
JOHN R. GORMAN

DATED: January 21, 2021

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-000446-21

Case Caption: ELANSARY AHMED VS UNITED STATES
POSTAL SERVICE

Case Initiation Date: 01/21/2021

Attorney Name: JOHN ROBERT GORMAN

Firm Name: LUTZ SHAFRANSKI GORMAN & MAHONEY,
PA

Address: 77 LIVINGSTON AVE P.O. BOX 596
NEW BRUNSWICK NJ 08903

Phone: 7322490444

Name of Party: PLAINTIFF : Elansary, Ahmed, E

Name of Defendant's Primary Insurance Company
(if known): Self Funded

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Ahmed E Elansary? NO

Are sexual abuse claims alleged by: Thanaa F Elshater? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

01/21/2021

Dated

/s/ JOHN ROBERT GORMAN

Signed

